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Attorneys for Defendant  
DOUGLAS GREGORY EDWARDS

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

|                           |   |
|---------------------------|---|
| UNITED STATES OF AMERICA, | ) Case No. 2:20-CR-218-DAD                  |
|                           | )   |
| Plaintiff,                | ) <b>STIPULATION AND ORDER TO CONTINUE</b>  |
|                           | ) <b>STATUS CONFERENCE AND EXCLUDE TIME</b> |
| vs.                       | )   |
|                           | ) Date: September 20, 2022                  |
| DOUGLAS GREGORY           | ) Time: 9:00 A.M.                           |
| EDWARDS,                  | ) Judge: Hon. Dale A. Drozd                 |
|                           | )   |
| <u>Defendant.</u>         | )   |

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney Samuel Stefanki, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Christina Sinha, counsel for Mr. Edwards, that the status conference (currently set for September 20, 2022) may be continued to **October 11, 2022, at 9:30 a.m.** The parties specifically stipulate as follows:

1. On August 30, 2022, this matter was recently reassigned to District Judge Dale A. Drozd, and the previously set status conference was reset for September 20, 2022. ECF No. 55.
2. By stipulation, the defense now moves to continue the status conference to October 11, 2022, at 9:30 a.m.
3. The government has produced three productions of discovery, totaling

approximately 2,000 items of reports, audiovisual files, photographs, and other documents.

4. Defense counsel represents that she requires additional time to review the discovery, investigate and research possible defenses, research potential pretrial motions, consult with experts and her client, explore potential resolutions to the case, and otherwise prepare for trial.
5. Defense counsel believes that failure to grant the requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
6. The government does not object to the continuance.
7. Therefore, the parties stipulate that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Edwards in a speedy trial and request the Court so to find.
8. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between September 20, 2022 and October 11, 2022, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Edwards in a speedy trial.

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Respectfully submitted,

HEATHER E. WILLIAMS  
Federal Defender

Date: September 15, 2022

/s/ Christina Sinha  
CHRISTINA SINHA  
Assistant Federal Defender  
Attorneys for Defendant  
DOUGLAS GREGORY EDWARDS

Date: September 15, 2022

PHILLIP A. TALBERT  
United States Attorney

/s/ Samuel Stefanki  
SAMUEL STEFANKI  
Assistant United States Attorney  
Attorneys for Plaintiff

**ORDER**

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: September 16, 2022

  
UNITED STATES DISTRICT JUDGE